

## EXHIBIT A

Parties' Proposed Constructions for Claim Terms in U.S. Patent No. 6,724,435 (the "'435 Patent)

No.	Claim Terms	Plaintiff's Proposed Construction	Defendants' Proposed Construction
1.	"individual color"	A linear combination of colors or color components, such as red, green, blue, yellow, cyan, and magenta.	A linear combination of colors or color components.
2.	"without affecting the hue or the saturation of any other individual color"	<i>See "individual color," "hue" and "saturation."</i>  without affecting the hue or the saturation of any other individual color, that was not selected to be changed	Ordinary meaning (incorporating the construction of "individual color").
3.	"arbitrary interval of integers"	A range between two whole numbers	Ordinary meaning.
4.	"Characterizing"	Not indefinite.  Plain and ordinary meaning.  Or, in the alternative:  Specifying	Indefinite.
5.	"Input image pixel"	Plain and ordinary meaning.	Image data including an integer row, an integer column, and color component values for each of red, green, and blue.
6.	"Forming a corresponding plurality of output image pixels having said selected individual color"	No construction necessary.	Forming a plurality of output image pixels that each correspond to one of the plurality of input image pixels that have said selected individual color in the real time digital video input image with the hue or the saturation selected to be

			independently changed, the output image pixels having said selected individual color.
7.	“By performing arithmetic and logical operations”	Not indefinite. Plain and ordinary meaning.	Indefinite as to whether this clause modifies “identifying,” “changed,” or both terms,
8.	“Evaluating” and “Evaluated”	Not indefinite. Plain and ordinary meaning.	Indefinite.
9.	“viewer”	Graphic user interface (GUI) menu display, configured on a man-machine interaction (MMI) mechanism.	Indefinite – illustrates that method steps are performed by a human as discussed below.
10.	As applied to Claim 17: The combination of method steps and system elements in a single system claim: <i>operating</i> said master control device . . .; <i>selecting</i> an independent color hue control delta value or an independent color saturation control delta value . . .; <i>identifying</i> a plurality of said input image pixels . . .; <i>determining</i> corresponding output image pixel values . . .; <i>displaying</i> a real time digital video output image . . .	Not indefinite. Claim 17 contains permissible functional limitations that describe the system by reciting its capabilities. <i>MasterMine Software, Inc. v. Microsoft Corp.</i> , 874 F.3d 1307, 1313 (Fed. Cir. 2017).	Indefinite – A claim that “recites both a system and a method for using that system” is invalid as indefinite. <i>IPXL</i> , 430 F.3d at 1384.